

From: David McCaleb [mailto:damccaleb@yahoo.com]
Sent: Wednesday, April 04, 2012 12:25 PM
To: Baskin, Kathleen (EEA)
Cc: irwainfo@ipswichriver.org
Subject: Public comment on SWMI "Framework" proposal

Dear Ms. Baskin,

I am writing in response to the Sustainable Water Management Initiative (SWMI) "Framework" proposal of February 3, 2012.

I moved to MA from California in 2004 and was enthralled by the recreational opportunities provided by dozens of rivers and waterways. I soon learned that this was not always the case. I learned that, not so long ago, some were so polluted as to be deemed toxic to humans. I have since learned more about MA rivers and the importance of wise water management. Without careful management of water levels, these rivers and wetlands are again in danger. Of particular concern is the intentional seasonal draining of these valuable natural resources.

I appreciate the tremendous effort that state staff and others have dedicated to the SWMI process. The scientific findings and development of ecologically-based streamflow criteria represent a major step forward. However, serious weaknesses in the proposed SWMI Framework undermine its credibility, negate its effectiveness and thwart truly sustainable water management. These deficiencies must be addressed.

The goal of sustainable water management should be to use water wisely, so that our rivers, streams and wetlands have enough clean water to support healthy populations of native fish. Protecting the rivers that are healthy, and restoring those that are not, should be explicit goals of SWMI.

Currently, about 20% of Massachusetts sub-basins are seriously degraded by water withdrawals, and another 16% are vulnerable to becoming degraded if they were subjected to increased withdrawals. Yet the SWMI Framework proposes safe yield withdrawal limits that are several times higher than the latest science indicates is safe for fish; exempts some permitted withdrawals from having to fully minimize and mitigate the impacts of their withdrawal; and allows "non-essential" water use when flows are below safe levels. This is not sustainable water management.

Nothing in the SWMI proposal will prevent vulnerable rivers, streams and wetlands from falling below safe levels or being pumped dry; this is unacceptable. We can and must do better. We must seize this once-in-a-generation opportunity to begin a process of gradual restoration of degraded rivers, streams and wetlands. We should start by establishing protective safe yield withdrawal limits consistent with the latest research.

Thank you for the opportunity to comment.
Sincerely,

David McCaleb